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Attorney for Plaintiff

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 IVAN EARL BARNES, )  
10 Plaintiff, ) CASE NO.  
11 v. ) 2:23-cv-00720-EJY  
12 KILOLO KIJAKAZI, ACTING ) **UNOPPOSED MOTION**  
13 COMMISSIONER OF SOCIAL SECURITY, ) **FOR EXTENSION OF TIME TO FILE**  
14 ) **PLAINTIFF'S BRIEF**  
15 Defendant. )  
16 \_\_\_\_\_)

17 Plaintiff, Ivan Earl Barnes, by his attorney, moves for a sixty (60) day extension of time  
18 to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed July 31,  
19 2023.

1 Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel  
2 requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance,  
3 between July 28, and September 22, 2023, staff in Counsel's office have two hundred and eleven  
4 (211) Plaintiff briefs due. This figure does not include Oral Arguments, appeals to Circuit  
5 Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout  
6 the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly  
7 prepare the brief by the current deadline. This request will not cause Defendant any undue  
8 hardship. This extension is needed to thoroughly and properly prepare the brief.  
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10  
11 Wherefore, Plaintiff requests an extension from July 31, 2023, up to and including  
12 September 29, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's  
13 Counsel who kindly has no objection to this request.

14 Dated July 24, 2023.  
15

16 Respectfully submitted,  
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18  
19 /s/Hal Taylor  
Hal Taylor, Esq.

20  
21 **IT IS SO ORDERED.**  
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23  
24   
UNITED STATES MAGISTRATE JUDGE  
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27  
28 DATED: July 24, 2023  
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